

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA,)	
)	
)	Case No. 3:22-CR-32
v.)	
)	
)	
JUSTIS ELLEN JOHNSON.)	
)	

UNOPPOSED MOTION TO CONTINUE TRIAL AND EXTEND
SCHEDULING DEADLINES

Comes now the Accused, Justis Ellen Johnson, who moves this Honorable Court for a continuance of the trial in this matter and to extend all scheduling deadlines. In support of this motion, the Accused would state as follows:

1. The trial in this matter is currently scheduled to begin on January 24, 2023. Counsel is working diligently to prepare this matter for trial; however, there is much to be done. Counsel recently received an additional 4 terabytes of information from the government that is material to the defense and must be reviewed. Counsel needs additional time to review the information, and to review it with the Accused, prior to determining what pretrial motions should be filed. For these reasons, the trial should be continued, and scheduling deadlines extended to allow sufficient time for the Accused to prepare her defense.

2. As it stands, the Accused is not ready to proceed to trial and in the interest of justice move this Honorable Court to continue the current trial date as well as all other scheduling deadlines. Specifically, the Accused would ask that this

matter be continued until sometime after July 3, 2022. Granting said continuance will allow the Accused the necessary time to review discovery, investigate, and continue in discussions with the government regarding potential resolution. Said continuance will serve the ends of justice in that the need to properly prepare the case for trial outweighs the best interest of the public and the Accused in a speedy trial. 18 U.S.C. § 3161 (h)(8)(A) & (B)

3. The right to a speedy trial has been fully explained to the Accused, who is in custody. She fully understands that the period of time between the filing of this motion for continuance and the rescheduled trial date will be fully excludable for speedy trial purposes.

4. Counsel hereby certifies that he has consulted with AUSA Frank Dale regarding the requested relief and has been granted authority to report that the government has no opposition.

WHEREFORE, PREMISES CONSIDERED, the Accused moves this Honorable Court for the relief as stated herein as well as any further general relief this Court deems both necessary and proper.

Respectfully Submitted,

EVANS BULLOCH & PARKER PLLC

/s/ Luke A. Evans

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Certificate of Service

I hereby certify that on October 28, 2022, I electronically filed the foregoing Motion with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: **Frank Dale and Jennifer Kolman**, Assistant United States Attorney, 800 Market Street, Suite 211 Knoxville, Tennessee 37902.

/s/ Luke A. Evans

LUKE A. EVANS